



January 5, 2024

VIA ECF

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge
United States District Court – District of NJ
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 7W
Trenton, NJ 08608

RE: **In re: Johnson & Johnson Talcum Powder Products Marketing, Sales
Practices and Products Liability Litigation – MDL 2738**

This document relates to:

Chastain v. Johnson & Johnson, et al., 3:23-cv-17135

Ebersole v. Johnson & Johnson, et al., 3:23-cv-17185

Ekern v. Johnson & Johnson, et al., 3:23-cv-17207

Mitchell-Tilley, v. Johnson & Johnson, et al., 3:23-cv-17255

Owens v. Johnson & Johnson, et al., 3:23-cv-17309

Smith v. Johnson & Johnson, et al., 3:23-cv-17339

Dear Magistrate Judge Singh,

Please accept this correspondence in response to Defendants' December 14, 2023, letter to the court regarding the plaintiffs who have failed to comply with the Court's September 1, 2023, Order regarding Plaintiff Profile Forms.

The Defendants' claim that basic case specific discovery has not been supplied even though the cases have been pending for at least six years is exaggerated. As the Court is aware, discovery in the MDL was bifurcated with the initial focus on liability and not case specific discovery. In fact, other than in discovery pool cases or as part of the *in extremis* protocol, case specific discovery was not ordered in these cases initially until April 4, 2021, with a due date of October 20, 2021, despite the fact that the MDL was formed in 2016. The original discovery due date was then stayed for almost two years because of Defendants' filing of bankruptcy.

Though admittedly filed after the deadline, Cutter Law, P.C. has produced the Plaintiff Profile Forms (PPFs) for Plaintiffs Amanda Chastain, Arleen Ebersole, Margaret Ekern, Marilyn Mitchell-Tilley, and Sheila Smith. We have been having difficulty reaching Plaintiff Jasmine Owens to finalize the information provided in her PPF in order to produce it. We believe with additional time we should be able to finalize the remaining Plaintiff's information to comply with the Court's Order.

The undersigned hereby requests a 30-day extension up to and including February 4th, 2024, in which to upload the remaining Plaintiff PPF, medical authorizations, and any medical records in

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their possession to MDL Centrality.

Very truly yours,



Jennifer S. Domer